

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

MAR 1 4 2014

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Mr. Andrew Bronson Regulatory Affairs Manager Tender Corporation 106 Burndy Road Littleton, NH 03561

Subject:

Product Name: Ben's 100 Insect Repellent

EPA Reg. No. 56575-7

Submission date: January 8, 2014

Amendment: Label Notification to Include TSA Acceptable Sizes

Dear Registrant:

The notification referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is unconditionally acceptable under 3(c)(5).

One copy of the labels stamped "Accepted" are enclosed for your records. Please submit one copy of the final printed labels before the product is released for shipment.

If you have questions concerning this letter, please call Owen Beeder at 703-308-8899 or via e-email at beeder.owen@epa.gov or you may call me at 703-305-6701.

Sincerely,

Richard Gebken Product Manager 10

Insecticide Branch

Registration Division (7505P)

ACMEPARAD MAR 1 4 2014

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January, 8, 2014, Label Text for Submission

{Front Panel All Container Labels }

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pestacide registered under EPA Reg. No. 56575-7

56975-7

Ben's 100 Insect Repellent

[Tick and Insect Repellent]

Active Ingredient:

*Deet (CAS Number 134-62-3) 98.11%

Total: 100%

*N.N-diethyl-m-toluamide (m-deet) + Related Isomers

["The choice of Adventure Medical Kits (logo)" -Dr. Eric Weiss]

[Repels Insects That May Carry West Nile Virus [And] [&] Lyme Disease]
[MAX FORMULA]

{if applicable}[Child -Resistant Packaging]

[Up to 10 Hours Protection]

[EFFECTIVELY REPELS]

[Mosquitoes, Ticks, Black Flies, Fleas. Biting Midges, Chiggers, Sand Fleas Stable Flies]

[Contains no alcohol. Non-oily]

Keep out of Reach of Children WARNING

DO NOT USE ON INFANTS

Not recommended for use on children under the age 10.

See [card] {or} [behind peel back] for additional precautionary statements.

Net Contents Oz. (ml) [Lotion] {or} {Pump Spray}

Tender Corporation

[106 Burndy Road]

{Littleton is a small town and mailing address is sufficient with just zip coce } Littleton, NH 03561

Questions? Call 1-888-258-4696 ext 236

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EPA Est. 56575-NH-1

{56575-7 Page 2 of 6} {January, 8, 2014, Label Text for Submission}

{Container Label-Lotion Back Panel}

DIRECTIONS FOR

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Read and follow all directions and precautions on [this product label]

{or}[all labels] and packaging {where size requires peel-back or second label}].

Apply a few drops to your palm and wipe on exposed skin areas. Do not apply over cuts, wounds or irritated skin. Do not apply near eyes and mouth. Apply sparingly around ears. Do not apply to children's hands. Do not allow children to handle this product. When using on children, apply to your own hands and then put on the child. Use just enough repellent to cover exposed skin. Do not use under clothing. Avoid over-application of this product. Wash hands after applying. After returning indoors, wash treated skin with soap and water. Repeat as needed.

{Container Label-Pump Spray Back Panel}

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Read and follow all directions and precautions on [this product label]

{or}[all labels] and packaging {where size requires peel-back or second label}].

Remove protective cap and spray on all exposed skin areas. Keep nozzle pointed away from face. Do not inhale. Do not apply over cuts, wounds or irritated skin. Do not apply near eyes and mouth. To apply to face, spray on hands and rub on. Apply sparingly around cars. Do not apply to children's hands. Do not allow children to handle this product. When using on children, apply to your own hands and then put it on the child. Use just enough repellent to cover exposed skin. Do not use under clothing. Avoid over-application of this product. After returning indoors, wash treated skin with soap and water. Wash treated clothes before wearing again. Do not spray in enclosed areas. For ticks and chiggers, apply to shoe tops, socks and around openings in clothing. Repeat as needed.

{Container Label continued for-Both Lotion and Pump Spray Back Panel}

Storage and disposal

Storage: Store in a cool dry (preferably locked) storage area in accessible to children and pets and away from fleat or open flame. Disposal: Do not puncture or incinerate. If empty: Do not reuse this container. Place in trash or, if available offer for recycling. If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

Refer to [card] {or} [behind peel back] for complete Precautionary Stateိုကိုမိုက်န

{Card Label-Front Panel}

 Ben's 100 Insect Repellent	<u> </u>
 [Tick and Insect Repellent]	
[Child -Resistant Packaging]	*
[Repels Insects That May Carry	•
West Nile Virus And	,
Lyme Disease]	•
[MAX FORMULA]	•
Up to 10 Hours Protection	•
REPELS:	
Mosquitoes, Ticks, Black Flies, Fleas. Biting	
Midges, Chiggers, Sand Fleas Stable Flies	

{Card Label- Lotion Back Panel}

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Read and follow all directions and precautions on [this product label]

{or}[all labels] and packaging {where size requires peel-back or second label}].

Apply a few drops to your palm and wipe on exposed skin areas. Do not apply over cuts, wounds or irritated skin. Do not apply near eyes and mouth. Apply sparingly around ears. Do not apply to children's hands. Do not allow children to handle this product. When using on children, apply to your own hands and then put on the child. Use just enough repellent to cover exposed skin. Do not use under clothing. Avoid over-application of this product. Wash hands after applying. After returning indoors, wash treated skin with soap and water. Repeat as needed.

{Card Label-Pump Spray Back Panel}

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Read and follow all directions and precautions on [this product label]:

{or}[all labels] and packaging {where size requires peel-back or second label}]:

Remove protective cap and spray on all exposed skin areas. Keep nozzle pointed away from face. Do not inhale. Do not apply over cuts, wounds or irritated skin. Do not apply near eyes and mouth. To apply to face, spray on hands and rub on. Apply sparingly around cars. Do not apply to children's hands. Do not allow children to handle this product. When using on children, apply to your own hands and then put it on the child. Use just enough repellent to cover exposed skin. Do not use under clothing. Avoid over-application of this product. After returning indoors, wash treated skin with soap and water. Wash treated clothes before wearing again. Do not spray in enclosed areas. For ticks and chiggers, apply to shoe tops, socks and around openings in clothing. Repeat as needed.

{Card Label -Both Lotion and Pump Spray Back Panel}

{Back Panel: on 3.5 ounce or smaller size products labeling will always contain complete "back panel" label on attached card (blister card type outer packaging) or on peel-back affixed to immediate (inner container) or both.

Please see Draft Label enclosed as representative of the "3.4 ounce packaging"}

Storage and disposal

Storage: Store in a cool dry (preferably locked) storage area in accessible to children and pets and away from heat or open flame.

Disposal: Do not puncture or incinerate. **If empty:** Do not reuse this container. Place in trash or, if available offer for recycling. **If partly filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING: Causes substantial but temporary eye injury. Do not get in eyes. Harmful if swallowed. Use of this product may cause skin reaction in rare cases. If you suspect a reaction to this product, discontinue use, wash skin and call your local poison control center. If you go to the doctor, take this product with you.

FIRST AID STATEMENT

If in Euro	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.					
If in Eyes	Call a poison control center for treatment advice.					
	Immediately call a poison control center or doctor for treatment advice.					
	Have a person sip a glass of water if able to swallow.					
If swallowed	Do not induce vomiting unless told to do so by the poison control center or doctor.					
	Do not give anything by mouth to an unconscious person.					

Have the product container or label with you when calling a poison control center or doctor or when going for treatment. For more information on this pesticide product (including health concerns, medical emergencies or pesticide incidents) you may call the National Pesticide Information Center at 1-800-858-7378. Note to physician: Probable mucosal damage may contraindicate the use of gastric lavage.

{Note: The First Aid statements' grid format will be used if market label space permits: otherwise a paragraph format will be used}

Physical or Chemical Hazards

Exposure to temperatures above 130° may cause bursting. Keep off synthetics, plastics, furniture, and painted surfaces. May damage leather.

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EPA Est. 56575-NH-1

{When size does not allow a peel back, product will <u>always be sold attached to a card with complete "back panel" labeling</u> from above and these very small sizes will have the following on the immediate (inner) packaging---Please see Draft Label enclosed as representative of the "very small packaging"}

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read, understand, and follow all directions and precautions on this label and on outer package.

Shake well. [Remove tab] [and twist cap] Keep nozzle pointed away from face. DO NOT: •spray directly on face •inhale •apply over cuts, wounds or irritated skin •spray in enclosed areas •apply near eyes or mouth •apply to children's hands • allow children to handle this product •use under clothing.

To use on face or children, spray on your own hands first and then apply sparingly and avoid eyes. Use only enough repellent to cover exposed skin. Repeat as needed. Wash hands after use. After returning indoors wash treated skin with soap and water.

Storage and disposal-Read, understand, and follow instructions on outer package.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

Read entire WARNINGS and PRECAUTIONS on outer package. Causes substantial but temporary eye injury. Do not get in eyes. Harmful if swallowed. Use of this product may cause skin reaction in rare cases. If any reaction occurs stop use, wash skin and call your local poison control center.

First Aid

If in Eyes Hold eye open and rinse slowly and gently with water for 20 minutes. Remove contact lenses after the first 5 minutes then continue rinsing eye. If swallowed Immediately call a poison control center or doctor for advice. Sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by poison control center or doctor. Do not put anything in mouth of an unconscious person. Have this label with you when going for treatment. For more information you may call the National Pesticide Information Center at 1-800-858-7378. Note to physician: Probable mucosal damage may contraindicate the use of gastric lavage.

Physical or Chemical Hazards Read and understand outer package

[Keep off synthetics, plastics, furniture, and painted surfaces. May damage leather.]

L,	J Denotes	optional/	aiternate	verbiage		
[}	Denotes	Language	that does	not appea	ar on market	labeling



{Everything below is Optional Selling Copy-Lotion, Pump Spray}

Full Strength repellent for maximum protection against ticks and all types of biting insects.

Use Ben's 100 when the bugs are especially intense or when all-day protection is needed. See our complete line of products for the prevention and treatment of outdoor ailments at www.tendercorp.com. Recyclable Packaging Made Primarily from Recycled Fibers. Please Recycle When Possible

A portion of your purchase goes towards Tender's Environmental Donation Program.

For more information, write Tender Corporation. Attn: Jayne

A Product of

Tender Corporation

P.O. Box 290

Littleton, NH 03561

www.tendercorp.com

- Ben's -- Trusted for over 30 years!
- Level {for packages with clear indicator of amount remaining}
- [Running Low] {for packages with clear indicator of amount remaining}
- Now with Twist Close Cap!
- Airplane carry-on size
- Maximum carry-on size
- TSA approved travel size
- TSA travel size
- TSA approved carry-on size
- TSA carry-on size
- Convenient Travel Size
- Convenient Airplane Travel Size
- Airplane Travel Size
- Airplane carry-on
- Maximum Airplane Size
- Max Airplane Travel Sixe
- Approved Airplane Travel Size
- Approved for Airplane Travel

- Approved Airplane Size
- Airplane Size
- Carry-on Size
- Max carry-on size
- Maximum Airplane Travel Size
- Max Airplane Size
- Distinctive DEET insect repellent formula that contains NO ALCOHOL.
- {roll on only} Now in a new Roll-on applicator allowing you
 to apply Ben's 100 exactly where you want it and not on
 your hands, clothing or gear. Great for applying to the
 face and neck. Just dab on and spread for complete
 coverage.
- For comfortable outing with the family. Protects against ticks, mosquitoes and [most] [all] types of biting insect.
- For 10 hours of protection.
- Full Strength repellent for maximum protection against ticks and [most] [all] types of biting insects

{} Denotes Language that does not appear on market labeling